

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION

FREE THE NIPPLE – SPRINGFIELD)
RESIDENTS PROMOTING EQUALITY,)
et al.,)
Plaintiffs,) Case No. 6:15CV3467-BP
v.)
CITY OF SPRINGFIELD, MISSOURI,)
Defendant.)

NOTICE OF AGREED EXTENSION OF DISCOVERY RESPONSES

COMES NOW Defendant, City of Springfield, and after consultation with and agreement from Plaintiffs' counsel, advises the court of an agreed extension of time to respond to discovery.

1. Plaintiffs, through their attorneys, filed their Request for Production of Documents on or about June 10, 2016.
2. Through an apparent mailing error, Defendant did not receive the requests until July 1, 2016.
3. This request included records of any communications between Council Members (9), employees, and/or members of the public related to the adoption of ordinances involved in this litigation.
4. Although Defendant is actively working to obtain these, the volume of emails for review are such that additional time is needed to fully respond. Additionally, for older documents, review of historical City records is necessary to provide a complete response.

5. To complete the remaining electronic searches and reviews necessary to respond to the remainder of the request, Plaintiffs have agreed to extend Defendant's additional time to respond.

6. Accordingly, the parties hereby notify the Court of an agreed extension of time until August 12, 2016 to respond to Plaintiff's Request for Production of Documents . The City will produce those records, minutes, agendas and other materials that are complete at this time and will supplement throughout the period as appropriate.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 28th day of July, 2016, the foregoing was filed electronically via the Clerk of the Court using the CM/ECF system, which provided notification of such filing to the following:

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